

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re:

KLMKH, Inc.,
a North Carolina corporation,

Debtor.

Case No. 22–30102

Chapter 11
Subchapter V

**MOTION FOR EXTENSION OF TIME TO
FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

Pursuant to Fed. R. Bankr. P. 1007(a)(5), KLMKH, Inc. respectfully requests an extension of time to file the documents identified and listed on the Notice of Deficient Filing, dated March 11, 2022 (Doc. 4), and the Notice of Defective Entry or Filing, dated March 11, 2022 (Doc. 5), which include KLMKH’s schedules and statement of financial affairs.

1. Rule 1007(a)(5) allows the Court to extend the time for a debtor to file its schedules and statement of financial affairs for “cause shown.”

2. In this case, cause for a short extension exists. Cause includes the following reasons:

- a. Two of KLMKH’s officials with primary knowledge of the information required to prepare the schedules and statement of financial affairs, Tyrus Young, who is KLMKH’s Controller, and Andrew Kramer, who is KLMKH’s General Counsel and


Secretary, have been away from their respective offices at different times since the filing of this case;

- b. The undersigned received information for the preparation of the schedules and statement of financial affairs on March 23, 2022, and is working to prepare the required documents; and
- c. Based on the documents received by the undersigned on March 23, 2022, KLMKH appears to have a small number of creditors, which should make preparation and verification of the schedules and statement of financial affairs a relatively simple matter.

3. This motion is not made in bad faith, and no prior request for relief has been made.

WHEREFORE, KLMKH, Inc. respectfully requests a fourteen-day extension of time to file the documents listed on Docs. 4 and 5, and for such other relief as the Court deems reasonable and just.

March 24, 2022

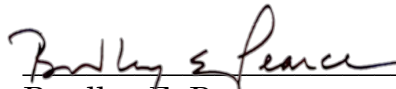

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Proposed Counsel for KLMKH, Inc.

CERTIFICATE OF SERVICE

I certify that the preceding document has been served on (I) all parties and parties-in-interest receiving notice by the Court's electronic filing or case management system (if applicable), and (II) the parties identified below or listed on any service matrix that may be attached to this document by depositing a copy of the document with the United States Postal Service, first-class United States mail, postage prepaid, addressed to the addresses stated below; or, if stated below, by (a) telecopy, at the fax number listed beside each party receiving service by fax; (b) depositing the document with a designated delivery service authorized under 26 U.S.C. § 7502(f)(2), addressed to the party identified below or on the attached service matrix, and by obtaining a delivery receipt; or (c) hand delivery to the party at the address written below.

March 24, 2022

A handwritten signature in dark ink, appearing to read "Bradley E. Pearce", is written over a horizontal line.

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